

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

This document relates to:

The Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al., No. 16-cv-7853; Aguilar, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09663; Addesso, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09937; Hodges, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-0117; Aiken, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-00450; Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al., No. 17-cv-02651; Abarca, et al., v. Kingdom of Saudi Arabia, et al., No. 17-cv-03887; Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-03908; Abedhajajreh v. Kingdom of Saudi Arabia, No. 17-cv-06123; Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-07914; and Abbate, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-08617

Case No. 1:03-md-01570-GBD-SN

ORAL ARGUMENT REQUESTED

**NOTICE OF AL RAJHI BANK'S RENEWED MOTION TO DISMISS AND
MOTION FOR SUMMARY JUDGMENT FOR LACK OF PERSONAL JURISDICTION**

PLEASE TAKE NOTICE that, pursuant to Rules 7(b) and 12(b)(2) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1, Defendant Al Rajhi Bank hereby appears for the purpose of moving the Court, before the Honorable George B. Daniels, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York,

New York, 10007, at a date and time to be determined by the Court, for the dismissal of the First Amended Complaint and all claims in the above-captioned actions as against Al Rajhi Bank for lack of personal jurisdiction. In the alternative, Al Rajhi Bank moves for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure for lack of personal jurisdiction. The Court should grant Al Rajhi Bank's motion because the undisputed facts show that the Court lacks personal jurisdiction over the Bank. If, however, the Court deems any material fact to be in dispute, the Bank requests that the Court hold an evidentiary hearing. As another alternative, Al Rajhi Bank requests that the Court grant the Bank's pending Objections to the Magistrate Judge's opinion declining to consider the Bank's renewed motion to dismiss for failure to state a claim under Rule 12(b)(6) of the Federal Rules of Civil Procedure. Objs. 1-2 (Apr. 9, 2021), ECF No. 6724. A memorandum of law in support of Al Rajhi Bank's Renewed Motion to Dismiss and Motion for Summary Judgement for Lack of Personal Jurisdiction and accompanying papers are filed herewith.

PLEASE TAKE FURTHER NOTICE that, pursuant to a scheduling order issued by the Honorable Sarah Netburn (ECF No. 9596), any opposing papers shall be filed electronically no later than July 1, 2024.

Dated: May 7, 2024
Washington, DC

Respectfully submitted,

WHITE & CASE

/s/ Christopher M. Curran

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CERTIFICATE OF SERVICE

I hereby certify that, on May 7, 2024, I caused a copy of the foregoing document to be served electronically pursuant to the Court's ECF system.

Respectfully submitted,

WHITE & CASE

/s/ Michael Mahaffey
Michael